



**S J C O G , I N C .**

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THE COUNTY OF  
SAN JOAQUIN

May 2, 2011

Phil Isenberg  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

Re: Delta Plan Third Staff Draft Comments

Dear Chairman Isenberg:

SJCOG, Inc. is the administrator of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Our staff is becoming more involved with the Delta Plan under the Delta Stewardship Council created by State statute as we have been in a very similar way with the Bay Delta Conservation Plan (BDCP). After reading the Delta Plan Third Staff Draft recently released, our staff has similar concerns with the Delta Plan as voiced in the development of the Bay Delta Conservation Plan (BDCP). One main concern our staff has in the Delta Plan draft, as with the development of the documents from the BDCP and/or other plans involving the Delta within San Joaquin County, are the unforeseen impacts to the SJMSCP with regards to the federal and state permits being implemented under our existing plan to balance development and protection of species within our county.

After a long seven year process in the late 1990's, the development of the SJMSCP was permitted by the US Fish and Wildlife Service and California Department Fish and Game (2001) as a 50 year plan to establish and protect habitat for over 97 species in San Joaquin County. This plan has been aggressively fulfilling the terms of the Implementation Agreement, mitigating for development in San Joaquin County by acquiring conservation easements and establishing habitat preserves which include areas no under the Delta Plan. Certain proposed activities and oversight of the Delta Plan such as the extent of restoration areas, may have a negative impact on existing preserves and our ability to acquire future preserves within San Joaquin County.

Also, a further concern our staff has after review of the Delta Plan Third Staff Draft is all the Delta counties which have or are developing HCPs are the same and can be treated the same. This should not be assumed. Except for the East Contra Coast Habitat Conservation

Plan/Natural Communities Conservation Plan, the other Delta plans are still in development and can adapt more readily to the impacts of the Delta Plan. This is a major difference between SJMSCP and the others.

Therefore, our agency strongly recommends all aspects of the SJMSCP (present and future) should be incorporated in the Delta Plan as part of the existing baseline conditions and the concerns will be fully addressed in the future Environmental Impact Report for the Delta Plan.

Our staff looks forward to working with the Delta Stewardship Council, staff and consultants on the development of the Delta Plan to insure a greater likelihood that the Delta Plan and SJMSCP will be complimentary to each other rather than conflicting.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Mayo', is written over the typed name.

STEVE MAYO  
Senior Habitat Planner